EXHIBIT 2

SDNY-Only Coordination Protocol[1]

Issue	Terms
Scope of Coordination / Safety Valves	• So long as the News Cases and the Class Cases remain on the same discovery schedule, absent good cause, no individual is deposed more than once across the SDNY Cases, unless designated as a Rule 30(b)(6) witness or an expert who issues reports in multiple cases
Cross-Production of Documents and Discovery	• Documents and written discovery cross-produced across the SDNY Cases
Plaintiff Side Allotted Hours	• 260-hour cap to be shared by the News Plaintiffs, with a maximum of 175 hours per Defendant Group and a maximum of 50 hours for non-party fact witnesses • 260-hour cap to be shared by the SDNY Class Plaintiffs, with no more than 2/3 of the time spent with any one Defendant Group • These caps include third party witness depositions and 30(b)(6) depositions
Defendant Side Allotted Hours	• 250-hour cap to be shared by Defendants for depositions of News Plaintiffs, with a maximum of 200 hours for News Plaintiffs' witnesses and 50 hours for non-party fact witnesses. • No more than 105 hours from any one Individual News Plaintiff. "Individual News Plaintiff" means The New York Times in the *New York Times* case, the Center for Investigative Reporting in the *CIR* case, and the publishers collectively in the *Daily News* case. • 175-hour cap to be shared by Defendants for depositions of SDNY Class Plaintiffs.
Per-Witness Time Limits (for depositions taken of Defendants' 30(b)(1) witnesses)	• For witnesses noticed in all SDNY Cases, total limit is 14 hours per witness (if solely in individual capacity), divided equally between the News Plaintiffs and the SDNY Class Plaintiffs • News Plaintiffs may share unused deposition time for a given witness with SDNY Class Plaintiffs, and vice versa • For witnesses noticed only in the Consolidated News Cases, total limit is 10 hours per witness (if solely in individual capacity)
30(b)(6) Notices	• In addition to the agreed-upon custodial 30(b)(6) deposition of OpenAI, News Plaintiffs will serve one consolidated merits 30(b)(6) notice on OpenAI and one consolidated merits 30(b)(6) notice on Microsoft, and the SDNY Class Plaintiffs will serve one consolidated merits 30(b)(6) notice on OpenAI and one consolidated merits 30(b)(6) notice on Microsoft.[2] • In addition to the agreed-upon custodial 30(b)(6) depositions, Defendants may serve one consolidated 30(b)(6) notice for each distinct entity among Plaintiffs.
30(b)(6) Time	• If any Defendant Group designates two or fewer individuals to testify regarding all topics set forth in a Rule 30(b)(6) notice, the Plaintiff Group is entitled to at least 18 hours of testimony from those individuals or individual. • Each Plaintiff Group may take no more than 25 hours of 30(b)(6) deposition testimony from each Defendant Group • Defendants may take no more than 25 hours of 30(b)(6) deposition testimony in each of the *New York Times* and *CIR* cases, no more than 38 hours of

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[1] The SDNY Cases include the News Cases, *Authors Guild et al. v. OpenAI Inc. et al.*, (S.D.N.Y. No. 1:23-cv-8292), and *Alter et al. v. OpenAI Inc. et al.*, (S.D.N.Y. No. 1:23-cv-10211).

[2] Plaintiffs reserve the right to seek leave of Court to serve additional 30(b)(6) notices, if appropriate.

	30(b)(6) deposition testimony in the *Daily News* case, and no more than 25 hours of 30(b)(6) deposition testimony from SDNY Class Plaintiffs
Expert Depositions	• This agreement does not apply to and shall not limit the number and duration of depositions of experts. • The Parties shall endeavor to negotiate in good faith a separate protocol governing expert depositions.